

## Simpson Thacher & Bartlett LLP

425 LEXINGTON AVENUE  
NEW YORK, NY 10017-3954

TELEPHONE: +1-212-455-2000  
FACSIMILE: +1-212-455-2502

Direct Dial Number  
+1-212-455-3070

E-mail Address  
Brooke.Cucinella@stblaw.com

# MEMO ENDORSED

BY ECF

July 2, 2020

The Honorable William H. Pauley III  
United States District Judge  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

Re: *United States v. Daniels*, 19 Cr. 931-WHP-3 (S.D.N.Y.)

Dear Judge Pauley:

We represent Defendant Quinteria Daniels in the above-captioned case. We write to request, with the consent of the Government and Pre-Trial Services, a modification of Ms. Daniels's conditions of release and personal address, which Ms. Daniels is seeking to change as soon as this coming Monday, July 6. On November 25, 2019, Ms. Daniels was ordered released on a \$50,000 Appearance Bond to be secured by two financially responsible persons. Among other conditions of her release, Ms. Daniels is subject to a restriction limiting her travel to the Southern and Eastern Districts of New York and the District of New Jersey.

Despite the difficult circumstances she has found herself in as a single mother in the time of COVID-19, Ms. Daniels has recently taken significant steps to better her life and the lives of her children. Chief among these steps is that Ms. Daniels has recently secured employment with Chick-fil-A, where she has become a valued employee. Ms. Daniels has also kept in contact with her family, who are located in Norfolk, Virginia. In part due to COVID-19, Ms. Daniels has struggled to find childcare options that would allow her to pursue her employment while also ensuring that her children are cared for. To help with this, Ms. Daniels's aunt, who lives in Norfolk, Virginia, with her husband and two children, has offered Ms. Daniels a place to live, where her extended family can and will assist with childcare while Ms. Daniels continues working at Chick-fil-A. Ms. Daniels' aunt has worked as a receptionist at the front desk at a Ramada Inn for years, and has a stable household she shares with her husband and two children. Along with her aunt's family, Ms. Daniels has additional extended family in the Norfolk area who have expressed their willingness to offer support to Ms. Daniels and her children during this difficult time in her life. Significantly, Ms. Daniels

July 2, 2020

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has already established herself as a valued employee, and Chick-fil-A has already approved a transfer to the Virginia franchise located near her family.

Accordingly, we respectfully request that Ms. Daniels be allowed to move to and be supervised out of Norfolk, Virginia, where she will stay with her aunt's family until she can secure an apartment of her own nearby. Additionally, we ask that Ms. Daniels's conditions of release be altered to allow her to travel to and from Virginia and the Southern District of New York as necessary for her case (Ms. Daniels owns a car). The opportunity to live with her aunt's family while she establishes herself and to be close to a positive role model presents a significant opportunity for Ms. Daniels and her children – it will bring them closer to Ms. Daniels's family, who will be a positive influence in the lives of Ms. Daniels and her children. Ms. Daniels has fully complied with her conditions of release to date and intends to continue doing so: she is fully committed to appearing in Court for all future court appearances, and living with (and eventually nearby) her aunt's family will allow her children to be cared for while she appears in Court.

We have conferred with Ms. Daniels's Pretrial Officer in New Jersey, Officer Daniel Milne, as well as pretrial in New York, and Assistant U.S. Attorney Rebecca Dell, who have advised that they consent to Ms. Daniels's request to move to Virginia and to modify her conditions of release. Officer Lisa Chan, from SDNY, advises that she will reach out to Pretrial Services in the appropriate district in Virginia to supervise Ms. Daniels should her request to move be granted.

Thank you for your consideration.

Respectfully submitted,

/s/ Brooke Cucinella  
Brooke Cucinella

cc: AUSA Rebecca Dell

Application granted.

SO ORDERED:

  
WILLIAM H. PAULEY III  
U.S.D.J.

July 2, 2020